

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

BARBARA MEIER, *et al.*,

Plaintiffs,

v.

UHS OF DELAWARE, INC., *et al.*,

Defendants.

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Case No. 4:18-cv-00615-ALM

AGREED JOINT MOTION TO MODIFY SCHEDULING ORDER

TO THE HONORABLE UNITED STATES DISTRICT COURT:

COMES NOW, all of the Plaintiffs and all of the Defendants, by and through their Attorneys of Record, and files this Agreed Joint Motion to Modify Scheduling Order and would show as follows:

1.00 CERTIFICATE OF CONFERENCE

1.01 Counsel for all of the Parties have conferred regarding the merits of this Motion and this Motion is unopposed. A proposed “Agreed Order Granting Agreed Joint Motion to Modify Scheduling Order” has been submitted to the Court contemporaneously with the filing of this Motion.

2.00 PROCEDURAL BACKGROUND

2.01 As of now the Pre-trial Conference in this case is set for February 28, 2020 at 9:00 a.m. In preparation for that Conference under the Order entered herein setting forth the pre-trial schedule for the parties. The Parties have exchanged Motions in Limine, Witness Lists, Exhibit

Lists, and Deposition Designations / Extracts. The Parties have also exchanged their respective Responses and Objections thereto. However, despite the efforts of counsel the parties have not conferred with one another on these matters as thoroughly as they believe they should to aid the Court in advance of the February 28th hearing at 9:00 a.m.

2.02 The Parties are still actively engaging in oral depositions this week, and many of the attorneys are traveling today to Florida to three additional oral depositions in this case tomorrow and the next day. Two more depositions were taken in the last two days. The Parties respectfully request the entry of an Order granting the Parties until Tuesday, February 25, 2020 in which to more fully confer with one another regarding the various pre-trial filings and until February 26, 2020 to notify the Court in writing of the matters which are unopposed or opposed for the Court's consideration.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request the entry of an Order granting them until Tuesday, February 25, 2020 to confer on all of the various pre-trial filings, the Responses or Objections thereto, and until Wednesday, February 26, 2020 to advise the Court in writing of the matters which are opposed and unopposed, and for any and all other relief, at law and in equity, for which the Parties may show themselves justly entitled.

Respectfully submitted,

/s/ John T. Burkhead

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing has been served upon all attorneys of record listed below on this 19th day of February, 2020 via electronic filing / service.

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/s/ John T. Burkhead
JOHN T. BURKHEAD